

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
(Indianapolis Division)

FILED  
U.S. DISTRICT COURT  
INDIANAPOLIS DIVISION

16 FEB 24 PM 2:20

SOUTHERN DISTRICT  
INDIANA  
LAURA A. BRIGGS  
CLERK

RED BARN MOTORS, INC., \*  
PLATINUM MOTORS, INC., \*  
MATTINGLY AUTO SALES, INC., \*  
YOUNG EXECUTIVE MANAGEMENT \*  
& CONSULTING SERVICES, INC., \*  
Individually, and on behalf of other \*  
members of the general public \*  
similarly situated \*

DOCKET NO. 1:14-cv-01589-TWP-DLP  
CLASS ACTION  
Jury Trial Demanded

v. \*

COX ENTERPRISES, INC., \*  
COX AUTOMOTIVE, INC., \*  
NEXTGEAR CAPITAL, INC., \*  
F/K/A DEALER SERVICES \*  
CORPORATION, successor by merger \*  
with Manheim Automotive Financial \*  
Services, Inc., and JOHN WICK \*

\*\*\*\*\*

**MOTION TO APPEAR PRO HAC VICE**

Now into Court, pursuant to S.D. Ind. R. 83-6, comes Gladstone N. Jones, who respectfully requests entry of an order granting leave to appear *pro hac vice* for the purpose of appearing as counsel on behalf of Red Barn Motors, Inc., et. Al., in the captioned matter. In support of this motion, the undersigned states the following:

1.

I am admitted to practice and in good standing, *i.e.*, currently authorized to practice as an attorney, in the following United States courts and Louisiana's highest court: the United States Court of Appeals for the Fifth Circuit; the United States District Court, Middle District of Louisiana; the United States District Court, Eastern District of Louisiana; the United States District

Court, Western District of Louisiana; and the Louisiana Supreme Court. I was admitted to practice in those courts in 1992.

2.

I have never been disbarred or suspended from practice before any court, department, bureau, or commission of any state of the United States. I have never received a reprimand or been subject to other disciplinary action from any such court, department, bureau, or commission pertaining to conduct or fitness as a member of the bar.

3.

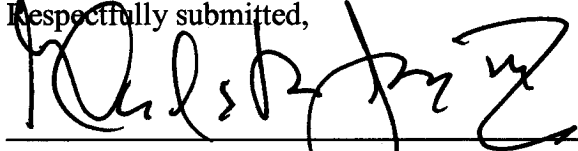
I certify that I have reviewed the *Seventh Circuit Standards of Professional Conduct* and the Local Rules of this court, including the Rules of Disciplinary Enforcement, and that I will abide by these rules and standards.

4.

I have submitted a check in the amount of one hundred and 00/100 Dollars (\$100.00) to the Clerk of this Court in payment of the administrative fees required to process this motion for admission *pro hac vice*.

Wherefore, Gladstone N. Jones respectfully requests that this Court enter an order granting leave to appear *pro hac vice* for the purposes of this cause only.

Respectfully submitted,



Gladstone N. Jones (#22221)

Lynn E. Swanson (#22650)

Kerry A. Murphy (#31382)

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AND

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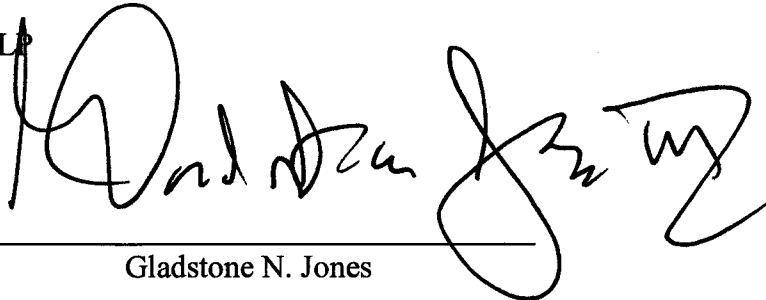
Email: [cfelder@felderllc](mailto:cfelder@felderllc)

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I do hereby certify that I have, on the 18<sup>th</sup> day of February, 2016, served a copy of the foregoing *Motion to Appear Pro Hac Vice* on all counsel of record via first-class U.S. Mail, postage prepaid and properly addressed to the following:

**David J. Jurkiewicz**  
**Steven D. Groth**  
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Suite 2700  
Indianapolis, IN 46204



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Gladstone N. Jones